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Via ECF

Honorable Vernon S. Broderick
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

APPLICATION GRANTED
SO ORDERED 

VERNON S. BRODERICK

U.S.D.J. 10/16/2024

Mr. Lacaj's bail conditions include travel within
the EDNY, SDNY, NDNY, and WDNY.

Re: United States v Steven Lacaj, 24 CR 362 (VSB)

Dear Judge Broderick,

I am counsel for Mr. Lacaj and write to respectfully request that his bail conditions be amended to now permit travel within the entire State of New York (adding Northern and Western Districts).

This request is made because Mr. Lacaj owns a company, Perfect Solar, selling solar panels to individuals and companies to become more environmentally efficient and reduce costs. As such, he is now employing sales representatives to sell these products all throughout the state. Traveling will be both to train those sales representatives and to visit with potential and existing customers.

Most of the travel is anticipated to be day trips, leaving in the morning and returning home the same day. Should he need to stay overnight somewhere within the state outside of the EDNY/SDNY area, he would notify his pretrial officer before and let her know when he returns to the District. Most importantly, any travel will not interfere with his current drug testing regime. If required to give a random urine sample to pre-trial, he will do it.

I have spoken to his pretrial officer, Karina Chin Vilefort, and she consents to this request.¹ She informs that the since his initial positive drug test, he has been fully compliant with the terms of his release and has no issues. AUSA Adam Hobson informs me that he defers to Pre-trial on this request.

I thank you in advance for your consideration.

Very truly yours,
Scott Leemon
Scott E. Leemon

cc: Karina Chin Vilefort, USPTS (via email)
AUSA Adam Hobson (via ECF)

¹ I sent a draft of this letter to her for approval before submitting to the Court.